

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

IVANA WILLIAMS

PLAINTIFF

Vs.

CAUSE NO. 3:24-cv-606-KHJ-MTP

MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY

DEFENDANT

MOTION TO WITHDRAW BY COUNSEL FOR THE PLAINTIFF

COME NOW the undersigned attorneys for the Plaintiff, IVANA WILLIAMS, and pursuant to L.U.Civ.R. 83.1(b)(3) and MRPC 1.16 file this, their Motion to Withdraw as Counsel for the Plaintiff. In support thereof, they would show the following:

1. The undersigned counsel represent the Plaintiff in a host of matters, including the instant litigation. An irrevocable conflict has arisen between the Plaintiff and her undersigned counsel regarding the prudence of the Plaintiff's desired courses of action and objectives. If requested by the Court, further grounds for withdrawal can be shown at the hearing on this matter.
2. The Complaint in this matter has not yet been served. The current service deadline is January 2, 2025, although counsel for the Plaintiff have sought an extension of this deadline in order to allow the Plaintiff time to secure new representation. As such, there will be no materially adverse effects on the interests of the Plaintiff should the Court allow the undersigned counsel to withdraw and grant the Plaintiff time to secure new representation.
3. The undersigned have served the Plaintiff with a copy of this Motion, and will provide her with the Notice of Hearing after the instant Motion has been filed.
4. Due to the nature of this Motion, Plaintiff respectfully requests the Court waive any requirement for a separate memorandum in support hereof.

WHEREFORE, PREMISES CONSIDERED, the undersigned counsel request that this matter be set for a hearing, and at the conclusion of said hearing that they be permitted to withdraw from representation of the Plaintiff, and that they be relieved of any further representation of her.

Respectfully submitted, this the 27th day of December, 2024.

/s/ J. Matthew Eichelberger
J. Matthew Eichelberger

/s/ Madeline M. Iles
Madeline M. Iles

/s/ Bobby Moak
Bobby Moak

J. Matthew Eichelberger
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CERTIFICATE OF SERVICE

I, J. Matthew Eichelberger, hereby certify that a true and correct copy of the Motion to Withdraw by Counsel for the Plaintiff was electronically filed with the Clerk of Court via the ECF system, which caused a true and correct copy of the same to be forwarded to all counsel of record. Further, a true and correct copy of the same has been delivered to the Plaintiff by email.

This the 27th day of December, 2024.

/s/ J. Matthew Eichelberger
J. Matthew Eichelberger